

ATTACHMENT A:

UNDER SEAL

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR
A CRIMINAL COMPLAINT**

I, Courtney Roanhorse, being duly sworn, depose and state that:

1. I am a federal Special Agent ("SA") with the United States Department of Homeland Security ("DHS"), Immigration and Customs Enforcement ("ICE"), Homeland Security Investigations ("HSI"). I have been employed as a Special Agent since September 2019. I am currently assigned to the Special Agent in Charge located in Charlotte, North Carolina. I am a graduate of the Criminal Investigator Training Program and the HSI Special Agent Training program at the Federal Law Enforcement Training Center. Prior to my employment with HSI, I worked for the United States Customs and Border Protection ("CBP") as a Customs Officer from July 2015 to September 2019.

2. As SA with HSI, my duties include investigating violations of Titles 8, 18, 19, 21, 31, and 42 of the United States Code (U.S.C.). I received training in various criminal investigative techniques involving financial investigations, drug investigations, the execution of search warrants, and other methods related to criminal investigations. I have been trained in the laws and regulations related to various federal criminal offenses, including but not limited to narcotics smuggling, money laundering, immigration, fraud, and bulk cash smuggling. I have initiated or otherwise participated in criminal investigations related to those violations and am familiar with methods and techniques utilized by those committing narcotics smuggling, money laundering, bulk cash smuggling, and other violations of federal law.

3. I have initiated, executed, and been involved in investigations resulting in arrests for narcotics violations, bulk cash smuggling, and firearm offenses. I have interviewed defendants,

witnesses, and informants concerning the illegal trafficking of controlled substances, bulk cash smuggling, money laundering, and violations of immigration law.

4. The information contained in this Affidavit is based on the Affiant's personal participation in this investigation and from information provided to your Affiant by other law enforcement officers.

5. This Affidavit is submitted for the limited purpose of presenting facts to support a probable cause finding for the issuance of a criminal complaint against Manuel Antonio VASQUEZ PINEDA, a/k/a Emerson Leonel Trochez-Arita, a/k/a/ Emerson Troches, a/k/a Emerzon Troches, a/k/a Emerzon Trochez, ("VASQUEZ PINEDA"). I have not included each and every fact known to me concerning this investigation, and I have set forth only those facts necessary for said purpose. Where statements of individuals are described herein, those descriptions are intended to convey the sum and substance of such statements and are not exact quotes, unless otherwise indicated.

6. Sufficient facts exist to support a probable cause finding that VASQUEZ PINEDA has violated Title 8, United States Code, Section 1326(a)(1); Title 21, United States Code, Section 841; and Title 18, United States Code, 922(g)(5).

FACTS IN SUPPORT OF PROBABLE CAUSE

7. On February 12, 2024, Charlotte Mecklenburg Police Department Detective Richard Rodriguez, in an undercover capacity, purchased approximately 29.3 grams of cocaine from a suspect. During the sale, the suspect informed Detective Rodriguez that the source of the cocaine was the user of cellular telephone number (704)273-8082, identified at the time by Detective Rodriguez as "Emerson TROCHEZ".

8. On February 23, 2024, Detective Rodriguez, working in an undercover capacity, contacted VASQUEZ PINEDA, known to law enforcement as "TROCHEZ" at that time, and arranged for the purchase of one and a half ounces of cocaine for \$1,500 U.S. dollars. On that same date, at approximately 1851 hours, VASQUEZ PINEDA arrived at the arranged sale location driving a grey Honda Accord. VASQUEZ PINEDA entered Detective Rodriguez's car and sold 45.2 grams of cocaine to Detective Rodriguez for \$1,500 U.S. dollars. The encounter between Detective Rodriguez and VASQUEZ PINEDA was video and audio recorded. During the sale of the cocaine, VASQUEZ PINEDA showed Detective Rodriguez a revolver that he was carrying concealed on his right-side in his waistband. VASQUEZ PINEDA informed Detective Rodriguez that he could sell Detective Rodriguez a .40 caliber handgun and showed Detective Rodriguez photos of the handgun.

9. On February 28, 2024, while in an undercover capacity, Detective Rodriguez contacted VASQUEZ PINEDA and arranged the purchase of two ounces of cocaine for \$2,000 U.S. dollars and a .40 caliber handgun for \$500 U.S. dollars. On that same date, the sale occurred at the Mobil gas station located at 7615 Nations Ford Road in Charlotte, North Carolina. At approximately 2130 hours, VASQUEZ PINEDA entered Detective Rodriguez's car. Inside the car, VASQUEZ PINEDA sold Detective Rodriguez approximately 59.2 ounces of cocaine and a .40 caliber HI-POINT firearm (serial # X7154563), which was fully loaded, in exchange for \$2,500 U.S. dollars. The encounter between Detective Rodriguez and VASQUEZ PINEDA was video and audio recorded. On March 5, 2024, Detective Rodriguez confirmed through a Trace Summary for the Firearm (X7154563) that the firearm was manufactured by Iberia Firearms, located in Galion, Ohio.

10. On July 2, 2024, the Charlotte Mecklenburg Police Department conducted a traffic stop and arrested VASQUEZ PINEDA for Trafficking Cocaine, based upon his previous cocaine sales to Detective Rodriguez. VASQUEZ PINEDA's vehicle had to be towed, and prior to towing, the officers involved in the inventory search of VASQUEZ PINEDA's vehicle located nine (9) grams of cocaine packaged in individual baggies, which was concealed within a pill bottle. The pill bottle was labeled with the demographic information for "Emerson TROCHEZ". Officers then transported VASQUEZ PINEDA to the Mecklenburg County Jail in Charlotte, North Carolina.

11. On April 11, 2025, pursuant to a call for service regarding a Shooting into an Occupied Dwelling, at approximately 0331 hours, CMPD responded to 7917 Shady Oak Trail, Apartment #1, Charlotte, North Carolina. Officers observed the residence had been struck by gunfire. No one was injured during the shooting. Through questioning of victims/witnesses, it was determined that VASQUEZ PINEDA was the shooter. His ex-girlfriend, Adeli Garcia, relayed to CMPD that they had ended their relationship approximately six weeks earlier, and on the night of April 11, 2025, she and other occupants inside the apartment did not allow VASQUEZ PINEDA inside the apartment. At that time, VASQUEZ PINEDA fired several shots at or into the dwelling. A warrant for the arrest of VASQUEZ PINEDA was issued.

12. Furthermore, VASQUEZ PINEDA was determined by law enforcement with Homeland Security Investigations (HSI) and Immigration and Customs Enforcement (ICE) Enforcement and Removal Operations (ERO), to be present in the United States illegally, Immigration A-file Number 200-029-074, State Identification Number NC2160927A, and that immigration records indicated that he was removed from the United States without record of a legal re-entry multiple times.

13. The Affiant conducted criminal justice inquiries and database searches, reviewed Immigration A-file 200-029-074 relating to VASQUEZ PINEDA, and discovered that:

a. His true name is Manuel Antonio VASQUEZ PINEDA, a/k/a Emerson Leonel Trochez-Arita, a/k/a/ Emerson Troches, a/k/a Emerzon Troches, a/k/a Emerzon Trochez, per his own admissions to immigration officers;

b. He is also known as Emerson Trochez-Arita, Emerzon Troches, Emerzon Trochez;

c. He is a native and citizen of Honduras by virtue of birth in San Pedro Sula, Cortes, Honduras, on July 16, 1987, per his own admissions to immigration officers. Additionally, VASQUEZ PINEDA has historically claimed his date of birth as March 16, 1990.

d. He was assigned FBI number 590184JC8, North Carolina State Identification Number NC2160927A, North Carolina Driver's License Number 38931717, (under the name Emerson L Trochez with date of birth, July 16, 1987), FIN Number 17381048;

e. On July 13, 2005, VASQUEZ PINEDA was apprehended in Rio Grande City, Texas by Border Patrol. VASQUEZ PINEDA claimed to be a minor, and was traveling with his father, Jose Manuel Vasquez-Lopez. VASQUEZ PINEDA admitted to illegal entry via the Rio Grande River on or about July 13, 2005, without being lawfully admitted or paroled into the United States. VASQUEZ PINEDA was processed for removal under 8 U.S.C 1229 (Deportation Processing) and was released from immigration custody on his own recognizance under the care of his father, Jose

Manuel Vasquez-Lopez. On July 14, 2005, VASQUEZ PINEDA was served with a Notice to Appear before an immigration judge.

f. On November 22, 2005, VASQUEZ PINEDA failed to appear at his removal hearing. On that same date, VASQUEZ PINEDA (date of birth, March 16, 1990) was ordered removed from the United States to Honduras by Immigration Judge, Lilliana Torreh-Bayouth, in Miami, Florida.

g. On August 28, 2007, VASQUEZ PINEDA (date of birth, March 16, 1990) was removed from the United States.

h. On April 2, 2014, Border Patrol encountered VASQUEZ PINEDA in the Rio Grande Vally in Texas. Border Patrol in the Rio Grande Valley Sector determined that VASQUEZ PINEDA, who at that time began utilizing the alias, “Emerzon Leonel Trochez-Arita” (date of birth, July 16, 1987), had re-entered the United States illegally. VASQUEZ PINEDA admitted to law enforcement of illegally crossing the international boundary on or about April 2, 2014, without being inspected by an immigration officer and claimed to be a citizen of Honduras without the legal documents required to enter or remain in the United States. VASQUEZ PINEDA’s prior order for removal from the United States, originally dated November 22, 2005, was reinstated on April 5, 2014, as per section 241(a)(5) of the Immigration and Nationality Act.

i. On April 5, 2014, VASQUEZ PINEDA was removed from the United States under the name “Emerzon Leonel Trochez-Arita, a/k/a Manuel Antonio VASQUEZ PINEDA.”

j. On May 25, 2019, VASQUEZ PINEDA was encountered by Border Patrol in Rio Grande Valley, Texas, and it was determined that VASQUEZ PINEDA had unlawfully re-entered the United States from Mexico without being lawfully admitted or paroled. Border Patrol encountered VASQUEZ PINEDA traveling with a minor, E.T.R., whom VASQUEZ PINEDA claimed to be his child/son. VASQUEZ PINEDA admitted to law enforcement with Border Patrol to illegally entering the United States on or about May 25, 2019, and claimed to be a citizen of Honduras without proper legal document to enter the United States.

k. On May 28, 2019, VASQUEZ PINEDA was processed for Reinstatement of Prior Order of Removal as per section 241(a)(5) of the Immigration and Nationality Act by Border Patrol in the Rio Grande Valley Sector. He was served a notice of intent to reinstate his prior removal order from the United States. VASQUEZ PINEDA was advised that it is a crime for an alien who has been removed from the United States to enter, attempt to enter, or be found in the United States without the express consent of the Secretary of Homeland Security.

l. On June 2, 2019, as he was present with a minor child, VASQUEZ PINEDA was released under an order of supervision into the United States and informed to report to the Enforcement and Removal Operations located in Charlotte, North Carolina.

m. On July 27, 2021, VASQUEZ PINEDA last reported to the Charlotte Enforcement Removal Operations office in Charlotte, North Carolina.

n. On August 10, 2022, VASQUEZ PINEDA and his claimed child/son failed to appear in immigration proceedings in Charlotte, North Carolina, at which

time Immigration Judge Amy Lee ordered that VASQUEZ PINEDA's son be removed in absentia.

o. Since 2021, VASQUEZ PINEDA has failed to report to ICE as directed by the Order of Supervision, hampering efforts to reinstate and execute the order of removal.

14. On March 26, 2025, after thorough review of the A-file, your Affiant conducted record checks of immigration indices and was unable to locate any record that VASQUEZ PINEDA applied for, or was granted, permission by the Attorney General of the United States or the Secretary of the Department of Homeland Security to apply for admission to the United States after deportation/ removal.
15. On February 23, 2024, VASQUEZ PINEDA was in possession of a firearm, which was shown to an undercover detective with the Charlotte Mecklenburg Police Department. On that same date, VASQUEZ PINEDA sold a trafficking amount of cocaine to the same undercover detective.
16. On February 28, 2024, VASQUEZ PINEDA sold a trafficking amount of cocaine, along with a firearm, HI-POINT .40 caliber handgun, to an undercover detective with the Charlotte Mecklenburg Police Department.
17. On April 11, 2025, VASQUEZ PINEDA was in possession of a firearm and shot multiple rounds into an occupied dwelling in Charlotte, NC, in Mecklenburg County. VASQUEZ PINEDA was identified as said shooter by witnesses, to include ex-girlfriend, A.G, according to law enforcement reports.

CONCLUSION


18. Based on the above information, your Affiant respectfully requests the issuance of a criminal complaint against Manuel Antonio VASQUEZ PINEDA a/k/a Emerson Leonel Trochez-Arita a/k/a Emerzon Troches a/k/a Emerzon Trochez for violations of Title 8, United States Code, Sections 1326(a)(1); Title 21, United States Code, Section 841; and Title 18, United States Code, 922(g)(5).

Respectfully submitted,


Courtney Roanhorse
Special Agent, HSI

**This affidavit was reviewed by AUSA Edward Ryan.*

Subscribed and sworn to before me this the 18th day of April, 2025


Hon. David C. Keesler
United States Magistrate Judge